

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KATHERINE P. KEALOHA (1)

*aka Katherine E. Kealoha,*

*aka Kathy Kealoha,*

*aka Kat,*

*aka Alison Lee Wong,*

LOUIS M. KEALOHA (2),

DEREK WAYNE HAHN (3),

MINH-HUNG NGUYEN (4),

*aka Bobby Nguyen,*

GORDON SHIRAISHI (5), and

DANIEL SELLERS (6),

Defendants.

Case No. CR 17-00582-JMS

MEMORANDUM IN SUPPORT OF  
MOTION

MEMORANDUM IN SUPPORT OF MOTION

Defendants can no longer fund a defense. Their assets have been effectively frozen by the federal government, and the terms of their bond prohibit them from even applying for a loan. On November 7, 2017, after much consideration, it has been determined by counsel and defendants that the defendants are unable, and will be unable, to raise the funds necessary to fund a defense for the instant case, which

will involve, as the government claims, a quarter of a million pages of evidence, some 500 witnesses, and a trial consuming four months.

Counsel also requests, and recommends, that *pro hac vice* CJA counsel be appointed to represent the defendants, pursuant to § 210.30.30 of the Criminal Justice Act Guidelines. These guidelines provide that, if it is in the interests of justice or other compelling circumstance warrant, *pro hac vice* CJA defense counsel may be appointed. The instant case is of such magnitude and complexity that there are no other attorneys locally available who are both qualified and not suffering from potential conflicts of interests.

DATED: HONOLULU, HAWAII, November 7, 2017.

/s/ Kevin P. H. Sumida

KEVIN P. H. SUMIDA  
Attorneys for Defendant  
KATHERINE P. KEALOHA (1)  
and LOUIS M. KEALOHA (2)

DATED: HONOLULU, HAWAII, November 7, 2017.

/s/ Myles S. Breiner

MYLES S. BREINER  
Attorneys for Defendant  
KATHERINE P. KEALOHA (1)

DATED: HONOLULU, HAWAII, November 7, 2017.

/s/ Gary A. Modafferi

GARY A. MODAFFERI  
Attorneys for Defendant  
LOUIS M. KEALOHA (2)